

3. In view of Plaintiff's motion to default Defendant for failing to answer the amended complaint, as embodied in the Motion to Proceed and Response [docket entry 13], Defendant has not sought Plaintiff's consent to this motion. An argument supporting this motion is included within Defendant's Brief in Opposition to Plaintiff's motion for entry of judgment by default, filed herewith.

This the 13th day of January, 2014.

By: /s/ John T. Murray
John T. Murray
Georgia Bar No. 531998
Email: jmurray@seyfarth.com
Christina F. Meddin
Georgia Bar No. 135969
Email: cmeddin@seyfarth.com
SEYFARTH SHAW LLP
1075 Peachtree Street, N.E.
Suite 2500
Atlanta, Georgia 30309-3962
Telephone: (404) 885-1500
Facsimile: (404) 892-7056

By: /s/ John I. Mabe
John I. Mabe
N.C. State Bar No. 9355
Email: jmabe@nexsenpruet.com
Nexsen Pruet, PLLC
4141 Parklake Avenue
Suite 200
Raleigh, North Carolina 27612
Telephone: (919) 653-7819
Facsimile: (919) 653-0435

Local Civil Rule 83.1 Counsel

